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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 Civ. 0589 (CGE)

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ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

MADISON SQUARE GARDEN, L.P., ISIAH LORD
THOMAS, III, and JAMES DOLAN,
Defendants.

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December 13, 2006
10:10 a.m.

VIDEOTAPE DEPOSITION of PETER
OLSEN, taken by the Plaintiff, pursuant to
Notice, held at the offices of Vladeck
Waldman Elias & Engelhard, P.C, 1501
Broadway, New York, New York, before
Debbie Zaromatidis, a Shorthand Reporter
and Notary Public of the State of New
York.

1. OLSEN

2. A. Well, she -- she prefaced that
3. by saying very clearly that you have to
4. promise you won't say anything about this
5. to anybody, which I -- I said I don't know
6. if I even said anything because I think
7. she leaned forward and, you know, said
8. with great emphasis I mean it. You can't
9. say anything about this to anybody else,
10. and we were at a booth. So I guess I do
11. remember the -- the leaning forward part
12. and the -- the emphasis on her -- desire
13. to emphasize confidentiality is clear to
14. this day in my mind.

15. Q. Okay. And then what else did
16. she say?

17. A. Well, then she launched into a,
18. for lack of a better word, a diatribe I
19. guess about the -- about Mr. Thomas, about
20. the Knicks. You are asking my specific
21. recollections of that?

22. Q. I am --

23. A. Words said or --

24. Q. To the best of your
25. recollection -- recollection what did she

OLSEN

you're going to sit on the bench, and that's in my words right there, but -- she mentioned -- she said it would be a media -- media field day if the papers ever got a hold of it.

Q. If the papers ever got a hold of what?

A. Well, she -- well, she -- again not necessarily in this order, but she said -- she mentioned Petra Pope. She said Petra Pope I think was -- was Magic Johnson's girlfriend, and Isiah knew Petra Pope from that relationship, and that Isiah had asked Petra Pope to go into the referees' locker room before a game and alluded to like make them feel comfortable or see if there is anything they need or something like that. She said that Isiah had been seen leaving a hotel with this -- [REDACTED]. What else? I am forgetting things here for sure. I guess that's -- I don't remember anything -- but it was -- that -- that was it.

OLSEN

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Q. Did she tell you that she thought Mr. Thomas was harassing her?

A. No.

Q. Did she tell you that she thought Mr. Thomas needed sexual harassment training -- training?

A. Well, she -- it is in the notes I think because I think I asked her something about sexual harassment training, and she -- and she -- I don't think she -- I know I wrote something about her emphasis on it, but I don't -- that would be read out of context to say that she -- she didn't emphasize it. She did pick up on it or mention it -- something about sexual harassment training, but it wasn't about her. It was more broadly stated because she had mentioned about Petra Pope and about, you know, [REDACTED] and somewhere in there was ceded [REDACTED] but nothing specific about [REDACTED]. It --

Q. Did you mention sexual harassment training or did

1 OLSSEN

2 Ms. Browne-Sanders?

3 A. I think I asked because it, you
4 know, if -- if she was alluding to -- I
5 can't say this for sure, but I -- I think
6 I -- because -- a natural question would
7 be, well, if what you're saying is true, I
8 -- I think I know that the -- you know,
9 all employees receive sexual harassment
10 training. Don't they get it? Haven't they
11 had it, something to that effect, and I
12 think she somehow reiterated that maybe in
13 terms of the -- they need it. It would be
14 helpful. She didn't answer it because I
15 think I asked it more like a question.
16 Don't they get, for example, sexual
17 harassment training.

18 Q. So from what Ms. Browne-Sanders
19 was telling you, it seemed to you that --

20 MS. CACACE: Strike that.

21 Q. Did Ms. Browne-Sanders tell you
22 that she had told Mr. Mills about Mr.
23 Thomas telling her he loved her and wanted
24 to go off site with her?

25 MR. GREEN: Objection to form.